

RONALD WATSON
3456 N HOPE STREET
PHILADELPHIA PA 19140
Primary Phone: 215-279-7150
Cell Phone: 267-319-5452
Email: Rwatson59@comcast.net

OBJECTIVE: Using my skills and experience in building trades, I would like to find a position as a general laborer where I will complete projects safely and efficiently according to standards.

SUMMARY :

- + US Army Veteran
- + Experienced in a variety of areas
- + Excellent communication skills
- + Willing to work flexible schedule

EXPERIENCE

Self - Philadelphia, PA
Home Maintenance Laborer

10/01/2013 - Still Working

Performed installations, repairs and general maintenance work for home owners. Met with customers to determine their renovation needs. Determined materials; provided cost estimates; purchased materials; Made repairs to bathrooms, kitchens and basements. Performed finished carpentry including window and door installation. Also installed and repaired receptacles and fixtures. Followed local code and safety regulations. Maintained financial records for business.

A & R Metals - Fairless Hills, PA
Metal Extractor

04/01/2013 - 10/01/2013

Utilized screw drivers, drills, hammers and other hand tools to extract metals from electronic equipment such as cell phones and computers for recycling and reprocessing. Broke down and separated materials and located to appropriate areas. Maintained clean work area, free of debris. Handled hazardous materials safely in accordance with OSHA standards.

Alpha Source - Philadelphia, PA
Shipping and Receiving Clerk

10/01/2011 - 04/01/2012

Operated clamp forklifts to move cases of cleaning products throughout a warehouse. Loaded and unloaded trucks. Placed merchandise in appropriate areas. Labeled shipments.

Transcontinental Direct - Warminster, PA
Machine Operator

07/01/2008 - 05/01/2009

Observed machine operations to ensure quality and conformity. Adjusted machine components, tension and pressure according to size or processing angle of product. Operated packaging machines. Removed finished packages from machine and separated any rejected items. Regulated machine flow and speed. Stopped or reset machines when malfunctions occurred. Clear any jams and reported malfunctions to supervisor. Secured finished packaged items by hand, gluing, stapling, or attaching fasteners. Stocked and sorted product for packaging or filling machine operation. Replenished packaging supplies. Inspected finished products for quality control.

Davis Company - Philadelphia, PA
Forklift Operator

03/01/2007 - 07/01/2008

Using forklift to retrieve boxed paper products, transferred materials to be staged at warehouse bay door locations. Used cherry picker, elevator fork lift, pallet jacks and stand-up or sit-down forklifts to transfer products. Also unloaded shipments. Examined records such as manifests, invoices or orders to verify accuracy of incoming and outgoing loads. Prepared documents to route materials properly. Communicated with supervisors to rectify any problems such as damages, shortages, and nonconformance to

EXHIBIT D-1

A&S Manufacturing - Philadelphia, PA
Machine Operator

01/01/2004 - 12/01/2006

Operated and set dies in presses to manufacture assorted parts such as furniture components and cable boxes. Formed materials to include steel, copper, aluminum and brass. Maintained cleanliness and safety of environment. Practiced quality control and maintained tolerance to specifications.

Axiom Mailing Services - Philadelphia, PA
Material Handler

01/01/1999 - 01/01/2004

Operated fork lifts to move mail from four-story racks to appropriate locations within a Post Office warehouse to be processed and sorted.

Pep Boys - Philadelphia, PA
Installer

01/01/1993 - 10/01/1998

Installed tires of varying size on light trucks and automobiles. Also changed oil and other fluids and installed lights on vehicles. Maintained a clean workplace.

Pinkerton Security - Philadelphia, PA
Security Guard

06/01/1989 - 05/01/1992

Provided security at various sites such as hospitals and construction sites to protect personnel, visitors, materials and facilities. Patrolled areas by foot to ensure that buildings, windows and doors were locked. Wrote up reports on a daily basis. Communicated with supervisors to report any problems or potential issues.

Computer Transport - Thorofare, NJ
Truck Driver

03/01/1983 - 12/01/1987

Operated a straight truck to deliver commercial copiers and computers to business throughout tri-state area. Loaded and unloaded trucks using pallet jacks and fork lifts. Checked paperwork and inventories to ensure that customer orders were accurate. Trained and mentored new employees. Processed orders safely and efficiently.

MILITARY HISTORY

Army

Honorable

Army Personnel Clerk: Responsible for updating military records, awards, transfers, promotions and other categories. Originated and prepared correspondence, received and sent official mail. Responsible for other communications including telephones. Performed most administrative and office functions.

EDUCATION

Delaware Valley Trade School
Philadelphia, Pennsylvania

Vocational/Technical Certificate

CERTIFICATIONS AND LICENSES

Forklift Operator Issued by Modern

881

#12

APPLICATION FOR EMPLOYMENT

We are an equal opportunity employer, dedicated to a policy of non-discrimination in employment on any basis including race, color, age, sex, religion, handicap or national origin.

PERSONAL INFORMATIONDate 12-1-14

Name

Last WATSON First Ronald Middle

Present Address

Street 3456 HOPE ST City Philadelphia State PENNSYLVANIA Zip 19140

Permanent Address

Street 3456 HOPE ST City Philadelphia State PENNSYLVANIA Zip 19140

Phone No.

215-279-7150 CELL # 267-319-5452

Referred By

Buck County Courier TimesAre you 18 years of age or older? ☒ Yes ☐ No**EMPLOYMENT DESIRED**

Position

Punch Press Operator

Date You Can Start

12-1-14

Salary Desired

OPENAre You Employed Now? ☐ Yes ☒ No

If So May We Contact Your Present Employer?

☐ Yes ☐ NoEver Applied to this Company Before? ☐ Yes ☒ No

Where?

When?

EDUCATION

Name and Location of School

Circle Last Year Completed

Did You Graduate?

Subjects Studied and Degree(s) Received

High School

Big Bend Community College
EUROPE GERMANY

1 2 3 4

☒ Yes
☐ NoGENERAL Subject
H.S. Diploma

College

1 2 3 4

☐ Yes
☐ No

Trade, Graduate, Business or Correspondence School

Delaware Valley School of Trades
12th & Race St Phila PA

1 2 3 4

☒ Yes
☐ NoBuilding Renovation
Certificate of completion**GENERAL**

Subjects of Special Study or Research Work

Ability to comprehend job at hand!

Job Related Skills (computer, driver's license certifications, etc.)

Forklift Certified

EMPLOYMENT HISTORY List below your last four employers, starting with the last one first.

Date Month and Year	Name and Address of Employer	Phone Number	Supervisor	Salary (upon leaving)	Position	Reason for Leave
From 4-13 To 10-13	ARR METALS Frimess Mills Pa		STEVE LAZARSKI	\$650.00	Metal Extractor	Lay off
From 10-11 To 4-12	Alpha Source Phila Pa		BRIAN	\$400.00	Shipping Clerk	Temp Work
From 7-08 To 5-09	Trunkmetal DIRECT Warrminster Pa		MIKE	\$500.00	Machin Operator	Lay off
From 3-07 To 7-08	Davis Company Phila Pa		ADA	\$550.00	Metal Handler	Temp Work

REFERENCES List below three persons not related to you, whom you have known at least one year.

Name	Address	Phone Number	Position	Years Acquainted
1 Zaretha Ruffin	1712 N 29th St Phila Pa	267-847-2629	NURSE	20
2 Ronald BAINS	2010 Chadwick St Phila Pa	215-294-1007	MANAGER	15
3 Kyle Woods	2410 Nicholas St Phila Pa	267-526-8841	DRIVER	25

If you are to be hired by the company, you will be required to attest to your identity and employment eligibility, and to present documents confirming your identity and employment eligibility. You cannot be hired if you cannot comply with these requirements.

AUTHORIZATION

I certify that the facts contained in this application (and accompanying resume, if any) are true and complete to the best of my knowledge. I understand that any false statement, omission, or misrepresentation on this application is sufficient cause for refusal to hire, or dismissal if I have been employed, matter when discovered by the Company.

I understand that any employment is conditioned on a background check. I authorize the Company to thoroughly investigate all statements contained in my application or resume, and I authorize my former employers and references to disclose information regarding my former employment, character and general reputation to the Company, without giving me prior notice of such disclosure. In addition, I release the Company, any former employers and references listed above from any and all claims, demands or liabilities arising out of or related to such investigation or disclosure.

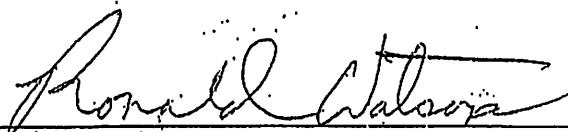
I understand and agree that nothing contained in this application, or conveyed during any interview, is intended to create an employment contract. I further understand and agree that if I am hired, my employment will be "at will" and without fixed term, and may be terminated at any time, with or without cause and without prior notice, at the option of either myself or the Company. No promises regarding employment have been made to me, and I understand that no such promise or guarantee is binding upon the Company unless made in writing by an authorized Company representative.

If I am offered employment I agree to submit to a medical examination and drug test, if required, before starting work. If employed, I also agree to submit a medical examination or drug test at any time deemed appropriate by the Company and as permitted by law. I consent to such examinations and tests, and I request that the examining doctor disclose to the Company the results of the examination, which results shall remain confidential and segregated from my personnel file. I understand that my employment or continued employment, to the extent permitted by law, is contingent upon satisfactory medical examinations and drug test, if required, and if I am hired a condition of my employment will be that I abide by the Company's Drug and Alcohol Policy.

I understand that acceptance of this form does not indicate there is a position open and does not obligate the Company to hire. If hired, I agree to abide by all Company work rules, policies and procedures. The Company retains the right to revise its policies or procedures, in whole or in part, at any time.

Date 12-1-14

Signature





LLOYD INDUSTRIES INC.

Remit: 231 Commerce Dr.
 Montgomeryville, PA 18936
 (215) 412-4445 • Fax (215) 412-4409
 e-mail: lloydind@firedamper.com
 www.firedamper.com

138 Industrial Loop West
 Orange Park, FL 32073
 (904) 541-1655 • Fax (904) 541-1657
 e-mail: lloydind@bellsouth.net
 www.firedamper.com

Rec
 10/31/16 ET
 last dm
 work
 10

Employee Separation Notice

Employee Name: RONALD WATSONSeparation Date: 10-29-2015 Last day worked: 10-29-2015

Please Note: This information will be used for unemployment purposes to determine the employee's eligibility for benefits.

☐ VOLUNTARY QUITIn writing? ☐ YES ☐ NO Notice given? ☐ YES ☐ NO if yes how much? _____☐ No call No show ☐ to accept other work ☐ to look for a new job☐ Dissatisfied with job ☐ Retirement ☐ Personal reasons☐ Injury or illness ☐ Personal reasons ☐ IncarcerationAny additional Comments: LAY OFF☐ TERMINATION

Name of person who discharged employee? _____

List prior warning date(s) ☐ None ☐ Verbal _____ ☐ Written _____☐ Dishonesty ☐ Intoxication ☐ Falsification of Applicant☐ Unable to provide I9 Documentation ☐ Excessive unexcused absences or tardiness☐ Violation of Company Rules (give policy/rule) _____☐ Failure to return from leave or vacation: Date due to return _____☐ Unsatisfactory Performance Willing but Unable☐ Unsatisfactory Performance, Intentional (had shown ability)☒ Lack of work ☐ Temporary ☐ PermanentPerson filling out this form: TOM PRENDERGASTEXHIBIT D-7

EXHIBIT D-9

(Signed-Co. Representative)

(Stewards Signature)

(Signed-Forumn)

☐
☐

UNSATISFACTORY
SATISFACTORY

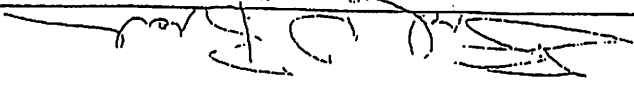
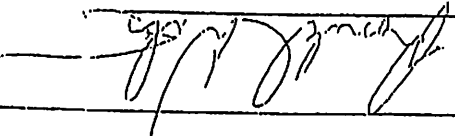
CHECK ONE

SETTLEMENT

You was laid off having the least amount of seniority in the Pass Shop. He is the lowest guy with seniority. In order to bump you must be able to perform that job. Article XV states working within 48 hours you must only have 24 hours to shopsteward and supervisor. This was violated.

Date 11-17-2015

MANAGEMENTS REPLY

Signed  (Steward)


Nature of Grievance VIOLATION OF ARTICLE X SENIORITY
Laid off with 10 years of seniority. Complete is made at performance level in every Dept.

Dept. Press DEPT Bldg

Name Roy Wilson

Date 11-9-15

Local Union # 19

Sheet Metal Workers International Association

GRIEVANCE FORM

67

6f

Tom Prendergast

From: Fred Braker [fbraker@LU19.com]
Sent: Thursday, August 11, 2016 10:17 AM
To: Lloyd ind
Subject: Ron Watson

Tom I met with Ron at my office after his lay off and researched that he was with the lowest seniority therefore there was nothing we could do as Lloyd industries was following our cba

Sent from I phone
Fred N. Braker
Business Representative
Sheet Metal Workers
Local Union No.19
(215)952-1999.
email fbraker@lu19.com

fax (215)952-0250

No virus found in this message.

Checked by AVG - www.avg.com

Version: 2015.0.6201 / Virus Database: 4633/12791 - Release Date: 08/11/16

EXHIBIT D-10



SHEET METAL WORKERS' INTERNATIONAL ASSOCIATION OFFICIAL APPLICATION FORM



Show Me The Label!

PERSONAL DETAILS:

LOCAL UNION #: 19

MEMBER #:

WAS THIS THROUGH AN ORGANIZING EFFORT? (YES/NO) **CIRCLE ONE**

1. Name: Ronald Watson (First) (Middle) (Last)
2. Address: 1500 E. Washington Lane
City: Philadelphia State: PA Zip: 19138
Phone #: (215) 319-5458 Email: Ronald590590@aol.com
Province: _____ Zone: _____

3. Date of Birth: 12, 7, 1959 Age: 55 Years
4. Sex: M 5. Race (Voluntary): B Marital Status: S
7. SSN: [REDACTED] (See Codes)

MEMBERSHIP DETAILS:

8. PAL Member: _____ (Yes/No)
9. Retiree Club: _____ (Yes/No)
10. Registered Voter: _____ (Yes/No)
11. Type of Member: _____ (See Codes)
12. Class of Member: _____ (See Codes)

CODES

5. Valid Race Codes

A	Asian
B	African American
C	Caucasian
H	Hispanic
N	Native American
O	Other

6. Valid Marital Status

D	Divorced
M	Married
P	Separated
S	Single
W	Widowed

11. Valid Types of Members

AL	Apprentice
AM	Apprentice Member
PM	Pre-Apprentice Member
RM	Regular Member

12. Valid Class Codes

AF	Absege Removal
AS	Assorted Workers
AW	Automobile Workers
BT	Building Trades
CU	Classified (incl. DS)
SC	Classified (SJA)
CO	Contract
GO	Goppersmith
FB	Fabricating
FE	Federal
FS	Food Service/Bakery
HS	Hotel Service Employee
HW	HVAC Service Employee
IN	Ind. Sheet Metal Wk
IW	Ind. Sheet Metal Wk (75%)
MN	Maintenance
NY	Navy Yard
PQ	Paper Gilder
PR	Production Worker
RA	Railroad Apprentice
RM	Railroad Helper
RS	Railroad Mechanic
RS	Residential Worker
RF	Roofing
SV	Shipyard
SW	Sign Workers
SP	Specialty

INITIATION DETAILS:

1. Initiation Date _____
2. Initiation Fee _____
5. Name and Address of Employer: _____

OATH

I hereby certify that I willingly subscribe to all the provisions and requirements of the Constitution and Ritual of the Sheet Metal Workers' International Association and in consideration of the acceptance of my application and being obligated as a member thereof, I hereby agree to remain loyal and true to the principals and policies and to be governed by the Constitution and Ritual of the Sheet Metal Workers' International Association in all matters now and hereafter included therein. I further agree to be governed by such Local rules and regulations as may be now effective, or which may be later adopted and made operative by affiliated local unions, which do not conflict with the Constitution and Ritual of the Sheet Metal Workers' International Association. I further authorize this Local Union to represent me for purposes of Collective bargaining, and in my behalf to negotiate and conclude all agreements as to hours of labor, wages, and other conditions of employment. This authorization shall apply for any employment by which I am employed, unless revoked by me through written notice to the Local Union.

Ronald Watson 6-16-15
(Signature) (Date)

EXHIBIT D-14
(Financial Secretary) (Date)

AUTHORIZATION

WORK ASSESSMENT-SERVICE FEE-UNION DUES

SHEET METAL WORKERS' INTERNATIONAL ASSN. LOCAL 19

To My Employer, who is party to collective bargaining agreement with the Sheet Metal Workers' International Association Local Union No. 19:

I hereby assign to Local No. 19 and hereby direct my employer to deduct from my wages earned by me as a result of employment under the aforementioned collective bargaining agreements between the Employers and Local No. 19, all work assessments, service fees and union dues, the amount of which shall be determined by a verified statement from the Union of the current assessment, service fee and/or union dues structure.

The aforesaid fees shall be remitted promptly by you to the Financial Secretary, or his successor, Sheet Metal Workers' International Association Local No. 19, 1301 South Columbus Boulevard, Philadelphia, PA 19147.

This assignment and authorization shall be effective and cannot be cancelled for a period of one (1) year from the date appearing below or until the termination date of the current collective bargaining agreement between the Company and the Union, whichever occurs sooner.

At that time it may be revoked by written notice given by me to my Employer and the Local No. 19, at any time during the period of ten (10) days prior to expiration of the one (1) Year period of the present agreement, whichever is sooner. If no such notice is given this authorization shall be irrevocable for successive periods of one (1) year thereafter with the same revocation at the end of each such period.

Name (print) Ronald Watson S.S. # 211-50-7557
 Signature Ronald Watson Date 6/16/2015 Membership # _____

AUTHORIZATION CARD

I hereby authorize the Sheet Metal Workers' International Association and/or its affiliated Local No. 19, to represent me for the purpose of collective bargaining in matters of wages, hours and other terms and conditions of employment, with my current employer, as well as all other employers for whom I may have worked in the past or for whom I may become employed after this date, on all present and future job sites.

I understand that this card may be used to obtain recognition from my current, future or past employers without an election.

This authorization is non-expiring, binding and valid until such time as I revoke it in writing.

Name: Ronald Watson Date: 6-16-2015
 Signature of Employee: Ronald Watson
 Employee Address: 1500 E. Washington Lane
 City: Phila State: PA Zip: 19138 Telephone #: 267-319-5452
 Current Employer: Lloyd Industries
 Job Classification(s): Machinist

BENEFICIARY CARD

1. EMPLOYER'S NAME Lloyd Industries 2. LOCAL # 19
 3. IA # _____
 4. SOCIAL SECURITY NO. _____ 5. DATE OF BIRTH 12-7-1959
 6. EMPLOYEE'S NAME (Please Print in Block Letters)
 Last Name Watson First Ronald Middle Initial _____
 7. EMPLOYEE'S ADDRESS 1500 E. Washington Lane
 City Philadelphia State PA Zip 19138
 8. SEX ☒ Male ☐ Female 9. DATE EMPLOYED 12-1-2014
 10. BENEFICIARY(S)—(You Have the Right to Change the Beneficiary at any time)
 Name of Beneficiary(s) and Address
 1. Zanetta Ruffin % 100
 2. _____ % _____
 3. _____ % _____
 11. RELATIONSHIP TO EMPLOYEE Spouse
 12. I HAVE PERSONALLY DESIGNATED THE BENEFICIARY(S) SHOWN ABOVE
 EMPLOYEE'S SIGNATURE Ronald Watson DATE 6-16-2015
 FNR011 MFNT RECORD CARD SASMI-II TRUST FUND

PA Employees		FL Employees	
Karen Ferguson	white	Ball, Justin	White
Eileen Lindsay	white	Brundage, Paul	White
William P Lloyd	white	Cua, Jonathan	Asian
Kristin Loudenslager	white	Davis, Thomas	White
Christina "Tia" Puzino	white	Diaz, Juan	Hispanic
Thomas Prendergast	white	Flores, Phillip	Guam
William Riggs	white	Green, Antwan	Black
Patrick Sharkey	white	Guanipa, Maximiliano	Hispanic
Stephanie Zitkus	white	Gutting, Alfred	Filipino
Fidel Argeta	hispanic	Lewis, Robert	Black
Gerbert Ayala	hispanic	Lott, Jadon	Black
Chris Griffin	white	McElwain, Harold D.	White
Jose Remberto Guevara	hispanic	Murphy, Tammy	White
Peter Hulayew	white	Perry, Carl	White
Guillermo Lopez	hispanic	Poland, John	White
Jorge Lopez	hispanic	Ramirez, Lefner	Hispanic
Thomas Malone	white	Retjos, Athan (Paul)	Hispanic
Edward Mower	white	Ricks, Joe	Black
Russell Murphy	white	Starling, James	White
Feliks Rappoport	white	Thomas, Larry	White
Santos R Reyes Zavala	hispanic	Thomas, Richard	White
Raul Rosalez Villarreal	hispanic	Wagner, Terry	White
Francisco Torres Martinez	hispanic	Washington, Reinaldo	Black
Brayan Antonio Ayala	hispanic	White, Anthony	Black
Blake Boyer	white	White, Gregory	Black
Richard Boyer	white	Widmond, Anthony	Black
Nguyen Can	Vietnamese		
Cruz-Melendez, Edwin	hispanic		
Eugene (Gene) Dionisio	white		
Frank Fadule	white		
William Ford	white		
Robert Gans	white		
Felix Granados	hispanic		
Stephen Gress	white		
Martin Guillen	hispanic		
Timothy Helsler	white		
Fredy Hernandez	hispanic		
Jose Hernandez Perez	hispanic		
Tam Van Huynh	Vietnamese		
Nathan Kushnir	white		
Dung Le	Vietnamese		
Hoang Le	Vietnamese		
Minh Le	Vietnamese		

EXHIBIT D-23

Jeffrey Lloyd	white		
Nataneal Martinez	hispanic		
Victor Martinez	hispanic		
Jose Morales	hispanic		
Tuan Nguyen	Vietnamese		
Trancito Ortiz-Ortiz	hispanic		
Dulip Patteram	Pakistani		
Romeo Perez Díaz	hispanic		
Thai Van Pham	Vietnamese		
Jose Martir Ramirez Hernandez	hispanic		
Jose Rodriguez Marquez	hispanic		
Frederick Roth	white		
Angel A Saravia Martinez	hispanic		
Rene Santos Saravia Martinez	hispanic		
Hau Tran	Vietnamese		
Ryan Tran	Vietnamese		
Mike Trinh	Vietnamese		
Axel J Valles Rosario	hispanic		
Jhonny Vasquez	hispanic		
Tivurcio Villarreal Flores	hispanic		
Minh Vo	Vietnamese		
James Welshe Jr	white		
Eugene Wohlfhart	white		
Mauricio Zavala	hispanic		
Jesse Zitkus	white		

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the

Eastern District of Pennsylvania

RONALD WATSON
Plaintiff

v.

LLOYD INDUSTRIES, INC.
Defendant

Civil Action No. 17-1049

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

Lloyd Industries, Inc.
237 Commerce Drive
Montgomeryville, P.A. 18936

RECEIVED
2017 MAR 24 P 3:13
MONTGOMERYVILLE, PA

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

SAMUEL A. DION, ESQ.
1845 WALNUT ST., STE. 1199
PHILA., PA 19103

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

PATRICIA A. JONES, Deputy Clerk

Date: 3/8/17

EXHIBIT D-25

JS 44 (Rev. 07/16)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Ronald Watson

DEFENDANTS
Lloyd Industries, Inc.

(b) County of Residence of First Listed Plaintiff Philadelphia
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Montgomery
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)
Samuel A. Dion, Esq., Dion & Goldberger
1845 Walnut Street, Suite 1199, Philadelphia, PA 19103

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
☒ 3 Federal Question (U.S. Government Not a Party)
☐ 2 U.S. Government Defendant
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACTS	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from Another District (specify)
☐ 6 Multidistrict Litigation - Transfer
☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
 Title VII and Section 1981

Brief description of cause:

Wrongful termination

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.
 DEMAND \$

CHECK YES only if demanded in complaint:
 JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DATE

3/6/2017

SIGNATURE OF ATTORNEY OF RECORD

DOCKET NUMBER

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CASE MANAGEMENT TRACK DESIGNATION FORM

Ronald Watson

CIVIL ACTION

v.
Lloyd Industries, Inc.

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (✓)

3-6-17
Date

Samuel A. Dion
Attorney-at-law

Ronald Watson, Plaintiff
Attorney for

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215-546-6269

samueldion@aol.com

Telephone

FAX Number

E-Mail Address

(Civ. 660) 10/02

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RONALD WATSON

VS.

LLOYD INDUSTRIES, INC.

No.

JURY TRIAL DEMANDED

17

1049

COMPLAINT

FILED MAR -8 2017

COMES NOW, Plaintiff, by counsel, and complains of
defendant as follows:

JURISDICTION

1. This Court has jurisdiction over this matter pursuant to the 42 U.S.C. Section 2000(e) et seq. of the Civil Rights Act of 1964 as amended. This Complaint has been filed within 90 days after issuance of a Notice of Right to Sue by the EEOC.

PARTIES

2. Plaintiff, Ronald Watson, is an adult individual who resides at 1500 East Washington Lane, Philadelphia, PA 19138.

3. Plaintiff's race is Black.

4. The defendant, Lloyd Industries, Inc., is a corporation registered in the Commonwealth of Pennsylvania with

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a place of business located at 231 Commerce Drive,
Montgomeryville, PA 18936.

5. Defendant employs more than 100 people.

FACTS

6. Plaintiff was first hired by defendant on or about
December 1, 2014 as a Machinist.

7. At all times material hereto, plaintiff was only one of
two Black Machinists employed by the defendant—the other being
Shawn Broadnax.

8. At all times material hereto, plaintiff was qualified
for the Machinist position and performed his job in a
satisfactory manner.

9. In fact, plaintiff has fifteen (15) years experience as
a Machinist.

10. Plaintiff's supervisors included Tom Pendergast
(Caucasian Plant Manager) who was first hired by defendant about
two months before plaintiff's termination.

11. Plaintiff did not receive any discipline during the
course of his employment.

12. On October 29, 2015, Mr. Pendergast called plaintiff
into his office and notified plaintiff that he was being "laid
off."

13. Plaintiff asked Mr. Pendergast why he was being laid off, and Mr. Pendergast responded: "Because I can."

14. Despite his claim that plaintiff was laid off, Mr. Pendergast offered plaintiff's union representative a different reason for plaintiff's separation from employment, which was that he was terminated, because he purportedly left work early on two occasions.

15. Both of Mr. Pendergast's purported reason for plaintiff's separation from employment were untrue.

16. Mr. Broadnax, the only other Black Machinist employed by defendant, was also let go in November 2015.

17. Had a layoff been truly necessary, based upon the union contract, Machinists must be terminated based upon seniority.

18. For this reason, Mr. Pendergast falsely alleged to the union that plaintiff was terminated for purportedly leaving work early on two occasions.

19. Furthermore, a White male Machinist (name unknown) with blond hair and blue eyes and a handlebar moustache (about 30-35 years old) and who owned a black Scion, had less seniority than plaintiff, but was retained by defendant and Mr. Pendergast.

20. Based upon information and belief, plaintiff was replaced with a less qualified White person previously described above.

21. The true reason for plaintiff's termination was because he is Black.

22. At all times material hereto, defendant acted through its employees who had authority to hire, discipline and fire.

23. Defendant's employees and/or agents intentionally treated plaintiff in a disparate manner and terminated plaintiff because of his race and color.

24. Plaintiff sustained damages as a result of the unlawful conduct of defendant.

COUNT 1- Race Discrimination

25. Plaintiff repeats paragraphs 1-24 as if more fully set forth herein.

26. By and through its conduct, defendant violated the Title VII, by intentionally discriminating against plaintiff by terminating his employment because of his race and color.

COUNT 2- Race Discrimination

27. Plaintiff repeats paragraphs 1-26 as if more fully set forth herein.

28. By and through its conduct, Defendant violated 42 USC Section 1981 et seq. of the Civil Rights Act of 1866 as amended, by intentionally discriminating against plaintiff by terminating his employment because of his race and color.

WHEREFORE, Plaintiff demands judgment against defendant and damages in an amount to be determined by a jury for pain and suffering, emotional distress, mental anguish, harm to reputation, lost income, punitive damages, costs, reasonable attorney's fees, and such other relief as the Court deems just and fair.



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